

IN THE UNITED STATES DISTRICT COURT
FOR WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

IN THE MATTER OF THE SEARCH OF
PRIORITY MAIL PARCEL BEARING
TRACKING NUMBER 9505 5131 8771 1253
7160 63, CURRENTLY LOCATED AT 2300
YORKMONT ROAD, CHARLOTTE,
NORTH CAROLINA

Case No. 3:21-mj-230

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

The undersigned, being duly sworn, deposes and states:

1. I, Abby Gilpin, a United States Postal Inspector currently assigned in Charlotte, North Carolina, am tasked with investigating various offenses, including use of the U.S. Mail to transmit controlled substances in violation of 21 U.S.C. § 841. I have been so employed since 2015. I have received formal classroom training from the U.S. Postal Inspection Service during the twelve-week Postal Inspector Basic Training Academy in Potomac, Maryland. Through my investigations and training, I have become familiar with the methods and techniques employed by individuals committing narcotics smuggling and money laundering of illicit proceeds, as well as other law violations.
2. On September 10, 2021, a Priority Mail parcel bearing USPS tracking number 9505 5131 8771 1253 7160 63 (hereafter, “the Suspect Parcel”), entered the mail stream in California. The return address indicated the send to be “Jhon Cansas, 1015 Faustina Ave., Modesto, CA 95351.” The Suspect Parcel was addressed to “Zuzan Burns, 4620 Nob Hill Dr., Kannapolis, NC 28081.”
3. On September 16, 2021, I attempted to verify the information provided on the Suspect Parcel label by using law enforcement search databases. I was able to determine that the sender’s name is not associated with the return address, and the recipient’s name is not associated with the recipient address.

4. The Suspect Parcel is described as follows:
 - A. Addressed to: "Zuzan Burns, 4620 Nob Hill Dr., Kannapolis, NC 28081"
 - B. From: "Jhon Cansas, 1015 Faustina Ave., Modesto, CA 95351"
 - C. Size: approximately: 20" x 20" x 12"
 - D. Weight: approximately: 14 pounds, 4.8 ounces
 - E. Postage affixed: \$85.80
 - F. Physical description: a brown parcel bearing tracking number 9505 5131 8771 1253 7160 63
5. I am aware, through my training and experience, that people who utilize the U.S. Mail to distribute controlled substances and their proceeds commonly use fictitious names and addresses in an attempt to avoid detection by law enforcement agencies. I am also aware, through training and experience, that California is a known source area for narcotics.
6. I am aware, also through my training and experience, that people often use the U.S. Mail, specifically Express and Priority Mail, for the delivery of controlled substances and proceeds for various reasons, some of which are listed below:
 - A. Items sent via Express and Priority Mail are considered to be First-Class Mail. Therefore, these items cannot be examined without a federal search warrant.
 - B. Express and Priority Mail are generally expected to be delivered in one to three days. This assures the sender of expedited delivery.
 - C. Various dispatch times (times which a mailed item is transported to the next destination) are available to customers upon request and provide the sender an opportunity to have some control as to the arrival of the mailed item.
 - D. Individuals desiring to either send or receive controlled substances and payments for these substances through the U.S. Mail can do so without having to provide identification. This reduces the possibility of revealing their true identity.
7. On September 16, 2021, Postal Inspectors in Charlotte, North Carolina, found the Suspect Parcel to be suspicious based on neither the sender nor recipient matching their stated addresses. Postal Inspectors contacted K-9 Handler Officer Bynoe of the Charlotte-

Mecklenburg Police Department (“CMPD”) for further investigation. Officer Bynoe responded to the United States Postal Inspection Service, located in Charlotte, North Carolina, with drug detecting K-9 Alvin, on September 17, 2021.

8. The Suspect Parcel was placed into a lineup. The Suspect Parcel was placed with four separate but similar control parcels at the United States Postal Inspection Service in Charlotte, North Carolina. I observed as K-9 Alvin walked among the parcels. K-9 Alvin alerted to the Suspect Parcel by sniffing the seams of the Suspect Parcel and alerting by sitting next to the Suspect Parcel, which is her signal to indicate the scent of a controlled substance. The examination took place at 11:45 am on September 17, 2021. The package has been secured since the examination occurred.
9. Narcotics Detection K-9 Alvin was certified by the National Police Canine Association (“NPCA”) by a previous handler. K-9 Alvin was most recently certified with Officer Bynoe on November 3, 2020. K-9 Alvin and Officer Bynoe were also certified through an 8-week narcotics K-9 course taught by K-9 Training Officer A. Betts with CMPD. K-9 Alvin is specifically trained to detect narcotic odors which include marijuana, cocaine, methamphetamine, ecstasy (MDMA), and heroine. During the last 8 months, K-9 Alvin has been allowed to sniff a large number of building interiors, vehicles, packages, parcels, and suitcases. K-9 Alvin’s detections have been found to be reliable. Officer Bynoe continues to conduct additional training to maintain K-9 Alvin’s proficiency.
10. Based on the above facts, probable cause exists to believe that the Suspect Parcel contains evidence of a crime, contraband, fruits, or other items illegally possessed, or property designed for use, intended for use, or used in committing a crime, in violation of 21 U.S.C. § 841. As such, I respectfully request that the Court issue the requested Search Warrant for the Suspect Parcel.

Respectfully,

/s/ Abby Gilpin

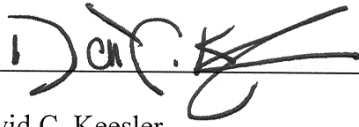
Abby Gilpin

U.S. Postal Inspector

Reviewed by AUSA Alfredo De La Rosa

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 21st day of September, 2021, at 1:10 PM.

Signed: September 21, 2021



David C. Keesler
United States Magistrate Judge

